

**Submission  
No 14**

## **INQUIRY INTO PRESSURES ON HEAVY VEHICLE DRIVERS AND THEIR IMPACT IN NEW SOUTH WALES**

**Organisation:** Livestock Bulk and Rural Carriers Association (LBRCA)

**Date Received:** 18 September 2023

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*Safer roads, better loads, and less red*

## **SUBMISSION TO THE INQUIRY ON THE PRESSURES ON HEAVY VEHICLE DRIVERS IN NSW**

The Livestock Bulk and Rural Carriers Association (LBRCA) welcomes the opportunity to provide our response to the inquiry on the pressures on heavy vehicle drivers in New South Wales.

### **Introduction**

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LBRCA is the peak body representing road transport businesses servicing the agricultural supply chain across New South Wales. We represent 250 transport businesses including owner-drivers, small fleet operators and large fleet operators each with hundreds of trucks and trailers.

LBRCA's submission concentrates on the pressures of insufficient rest area opportunities for heavy vehicle drivers, with a specific focus on regional and rural areas across NSW.

### **Summary of Recommendations**

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- **Recommendation 1:** That the NSW government support the development of a heavy vehicle cadetship to fulfil workforce gaps.
- **Recommendation 2:** No changes should be made to the current training and education requirements for transport companies employing truck drivers.
- **Recommendation 3:** All road infrastructure projects in NSW should be required to provide a minimum quantity of heavy vehicle rest areas, in accordance with the Guidelines.
- **Recommendation 4:** Rest area locations should be considered on the outskirts of towns or cities to consider driver needs.
- **Recommendation 5:** Improve identification of NSW heavy vehicle rest areas by implementing a classification system.
- **Recommendation 6:** Opportunities to increase capacity at existing NSW heavy vehicle rest areas should be explored.
- **Recommendation 7:** Class 1, and 3 heavy vehicle rest areas should have security camera technology installed to maintain safety of drivers.
- **Recommendation 8:** Adopt Avdata as the universal truck driver access system.
- **Recommendation 9:** Improve signage at emergency stopping bays.

### **Our industry**

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Transporting freight by road is a key element of the NSW economy and the provision of rest opportunities for heavy vehicle drivers is critical to this task.

Rest areas are used by heavy vehicle drivers to take long and short rest breaks, use amenities and check loads and vehicles. Heavy vehicle drivers must conform to fatigue management

legislation that specifies strict resting requirements and to fulfil these requirements, they require suitable rest area facilities that are regularly maintained.

Fatigue management is a high priority, and pressure, for industry. It is often difficult for industry to comply with fatigue law when there is insufficient opportunity to find a parking bay.

Heavy vehicle rest areas are critical to our industry and we need more, not less, to ensure drivers can legally comply with fatigue laws. They are heavily used by trucks, particularly during the late evening and early morning hours. LBRCA is aware of many heavy vehicle rest areas closures due to road works, road deviation or permanent road closures. For land transport and compliance with fatigue regulations, there are many opportunities to provide more and better facilities and establish proper, maintained rest stops where the public is discouraged from using.

*A good and safe rest area requires sound approaches to planning, location, and design!*

Although rest area capacity has been expanded in many areas and provisions for truck parking in some areas are vastly improved, most rest areas now lack sufficient truck parking space. Consequently, often drivers have no choice other than to keep driving until they find an opportunity to park.

There has been considerable funding for new road projects across NSW in the past decade. However, there has been limited consideration of heavy vehicle rest areas in these projects. While some highways have seen improvements in existing facilities, others have seen rest areas closed as road projects commence and not replaced when completed. All road projects in NSW should include consideration of the strategic locations of heavy vehicle rest areas of all classifications. Optimising the location of and access to such facilities will contribute greatly to the overall efficiency, security, and safety of NSW roads.

*Supporting industry safety initiatives*

LBRCA support Rod Hannifey's 'Green Light Reflector' program and want to see this program rolled out further, even if this requires a solution to ensure nominated informal sites can comply with current deceleration and acceleration requirements.

*Showcasing the heavy vehicle industry as a viable and rewarding career choice*

LBRCA sees many opportunities to improve the perception of the industry within the community including establishing clear pathways for new entrants to the industry, particularly young people, and recognising transport workers as professionals.

Thank you for the opportunity to input to this important inquiry. I'd be pleased to provide further information or explanation to assist the committee.

Yours faithfully,

Wade Lewis  
President



*Safer roads, better loads, and less red tape!*

**NSW LEGISLATIVE COUNCIL**  
**SUBMISSION TO THE INQUIRY ON THE PRESSURES ON**  
**HEAVY VEHICLE DRIVERS IN NSW**

**(i) Training requirements for heavy vehicle drivers**

*Heavy Vehicle Driver Pathway: Cadetship*

A under resourced workforce places additional pressure on current drivers to fulfil the freight task. The current NSW age and time based graduated heavy vehicle licencing system discourages young people from pursuing a career in road transport and fails to focus on maximising the skill of licence holders.

Additionally, licencing rules are rigid and a high barrier to entry. Currently, young people in NSW cannot operate common heavy vehicle combinations, such as B-doubles, until they are 21 years old. The challenge is heightened in regional and rural areas and leaves no opportunity for most transport businesses to employ school leavers.

It is important that young people aspire to a career in road transport rather than think of it as a job of last resort. Road transport is a crucial industry at the cutting edge of technology and operational complexity. It is much more than getting a product from A to B.

LBRCA understands that there have been several previous attempts to establish a heavy vehicle driver apprenticeship but these have each failed. This is why LBRCA is supportive of establishing a heavy vehicle driver cadetship based on hours not tenure where new drivers will benefit through on-the-job mentoring, training, supervision, and guidance.

The cadetship presents benefits for young and interested individuals, regional transport businesses, and communities by creating employment opportunities, fulfilling gaps in an ageing workforce, and creating safer roads by instilling safe learning habits from the outset of an individual's career.

Importantly, a developing a greater pool of safe and professional truck drivers to fulfil the growing freight transport task in the future will significantly reduce time and resource pressures being experienced by industry now.

If the cadetship is successful, it will remove barriers preventing people from a career as a truck driver and will contribute significantly to available career pathways in rural and regional areas. Over the longer term, it will greatly assist to recruit young people who will be our drivers and business operators of tomorrow.

**Recommendation 1:** That the NSW government support the development of a heavy vehicle cadetship to fulfil workforce gaps.

**(ii) Training and education requirements for companies employing heavy vehicle drivers.**

Almost every business in some way provides education, advice, or training to staff to help ensure they remain safe at work, and don't contribute to causing some form of safety incident.

The training and education requirements for companies employing heavy vehicle drivers vary. There is no single requirement for training and education for companies employing heavy vehicle drivers. However, this is adequately covered through adherence and compliance with the Heavy Vehicle National Law and associated Chain of Responsibility legislation.

Accreditation Schemes

Most companies employing heavy vehicle drivers are part of an accreditation scheme. The most common is the National Heavy Vehicle Accreditation Scheme (NHVAS). The NHVAS is a national formal process for recognising operators who have robust safety management systems in place. It is also increasingly being used to show compliance with general duty requirements under road transport law.

TruckSafe is a business and risk management system that is aligned at improving the safety and professionalism of trucking operators nationwide. Operators accredited with TruckSafe must meet four key standards including training, which is aimed at ensuring drivers are licenced, authorised and trained for the tasks which they are undertaking.

Both the NHVAS and TruckSafe are optional accreditation schemes.

Safety Management Systems

It is becoming more common for transport businesses to use a Safety Management System (SMS) to meet their safety obligations under the Chain of Responsibility (COR) and the Heavy Vehicle National Law (HVNL).

LBRCA agrees that the current training and education requirements for transport companies employing truck drivers is sufficient.

**Recommendation 2:** No changes should be made to the current training and education requirements for transport companies employing truck drivers.

**(iii) The availability, suitability, and accessibility of, and priority locations for heavy vehicle rest areas in metropolitan Sydney, and rural and regional New South Wales.**

Lack of rest areas, and/or availability of parking spaces within existing rest areas, place undue pressure on heavy vehicle drivers and there is a significant gap between the number of rest areas currently available in NSW and the number required to ensure drivers of heavy vehicles can manage their fatigue as required by law.

Between November 2022 and March 2023, Transport for NSW conducted a comprehensive audit of NSW formal heavy vehicle rest stops against the 2019 [Austroads Guidelines for the Provision of Heavy Vehicle Rest Areas](#)<sup>i</sup> (The Guidelines) to identify gaps on the NSW state network. The results of the audit found that NSW has 1363 existing formal heavy vehicle rest stops, a potential for 486 new heavy vehicle rest stops and a potential for 356 upgraded heavy vehicle rest stops<sup>ii</sup>.

The audit did not include informal rest areas, like the green reflector bays.

LBRCA support the 'Green Light Reflector' program developed by Rod Hannifey and want to see this program rolled out further, even if this requires a solution to ensure nominated informal sites can comply with certain conditions, including deceleration and acceleration requirements.

This program has proved invaluable to truck drivers in regional and rural NSW who often don't have access to larger, formal rest area sites.

Despite there being considerable funding for new road projects across NSW in the past decade, and the Guidelines being first published in 2005, there has been limited consideration of heavy vehicle rest areas in these projects. While some highways have seen improvements in existing facilities, others have seen rest areas closed as road projects commence and not replaced when completed.

LBRCA is aware of many heavy vehicle rest areas being closed due to road works, road deviation or permanent road closures. Examples include the Olympic Highway at Young and Henty, the Barton Highway at Murrumbateman and on the Newell Highway, which seen 27 informal truck rest stops reduced to six.

All road projects in NSW should include consideration of heavy vehicle rest areas that have sufficient capacity to accommodate current and future traffic volumes and heavy vehicle combinations.

It is worthwhile to consider repurposing road works stockpiles to heavy vehicle rest areas at the conclusion of works. This would require consideration of appropriate locations in the initial planning stages of any works project and should be included as a requirement in tendering documents.

**Recommendation 3:** All road infrastructure projects in NSW should be required to provide a minimum quantity of heavy vehicle rest areas, in accordance with the Guidelines.

To meet animal welfare obligations, livestock transporters must inspect livestock in transit at least every 3-4 hours. It is also important for them to inspect livestock loads before driving into towns, or centres.

An opportunity for drivers to stop on the outskirts of towns or cities to sleep, decouple trailers, and ideally, access local town facilities to do laundry and undertake other personal activities.

**Recommendation 4:** Rest area locations should be considered on the outskirts of towns or cities to consider driver needs.

In NSW, rest areas are currently listed by name. LBRCA proposes that the NSW implement a classification system for rest areas including unique assignment of a new 'rest area number'. The online [Rest areas map \(NSW\) - Transport for NSW](#) could be enhanced to include the number of available parking spaces.

**Recommendation 5:** Improve identification of NSW heavy vehicle rest areas by implementing a classification system.

**(iv) The suitability of heavy vehicle rest areas in terms of size, facilities, lighting, signage, and safety.**

The fundamental issues are the lack of sufficient Class 3, 4 and 5 HVRA's to complement Class 1 and 2 rest areas in NSW and capacity limitations at existing sites.

Between the main regional centre of Wagga Wagga and Albury, one HVRA is available at Henty that can accommodate up to three heavy vehicles only. Summerland Way between Grafton and Casino is alike with one HVRA that accommodate up to two heavy vehicles only.

Similarly, the existing rest areas on the Oxley and New England Highways often do not accommodate larger vehicle combinations and the limited parking bays are usually at capacity.

There are also significant gaps in rest area opportunities on the New England Highway and Pacific Highway for the volume of freight being transport by heavy vehicles along these key freight corridors. A growing freight task will only add to this burden.

An inability to find a suitable rest area can lead drivers to inadvertently exceed their regulated fatigue hours. This adds an unnecessary pressure on the heavy vehicle task.

Other rest area gaps in the heavy vehicle network include:

- Glen Innes to Moree
- Moree to Bourke
- Bourke to Broken Hill
- Wentworth to Broken Hill
- Throughout the Central West
- Kempsey to Clybucca
- Darlington Point to Hay
- Orange
- Narrabri and Narrabri West
- Cowra
- Hume Highway
- Armidale to Tamworth
- Griffith to Goolgowi

**Recommendation 6:** Opportunities to increase capacity at existing NSW heavy vehicle rest areas should be explored.

The size of a HVRA should be determined by its required capacity and accommodate current and expected future demand. Minimum facilities must include shade, rubbish bin and a flat surface (no incline). There must be access to a clean toilet every 50-75km at a minimum.

At designated HVRA's, more signage is required to ward other vehicles from using the parking area. Increased penalties should apply to non-heavy vehicles using heavy HVRA's. Safety at HVRA's is becoming problematic in certain areas of NSW. Many drivers will not stop at certain towns as it is simply unsafe to do so. Examples include Walgett and Moree. HVRA's should include CCTV and ample lighting to increase safety of drivers at these sites.

**Recommendation 7:** Class 1, and 3 heavy vehicle rest areas should have security camera technology installed to maintain safety of drivers.

An opportunity exists to manage access to driver facilities through a user access system. Such a system could assist to minimise vandalism, increase safety, automate lighting, and restrict access to truck drivers. The livestock industry currently uses an Avdata key, enabling access to a national network of truck washes and driver facilities including toilets and showers.

Avdata allows for monitoring of access to driver facilities including toilets and showers and can be used to manage fee-for-service items like water use at truck washes. It can also be used to activate lighting and other systems. There is an opportunity for the heavy vehicle industry to use Avdata for this purpose.

**Recommendation 8:** Adopt Avdata as the universal truck driver access system.

**(v) The use of heavy vehicle rest areas and emergency stopping bays for fatigue management and logbook obligations.**

There are several locations where drivers are engaging in unsafe practices such as sleeping in their vehicles, in emergency stopping bays, a metre from the road edge because of the lack of available rest area opportunities. This is a common occurrence on the Pacific Highway near Coffs Harbour. Emergency stopping bays should be used for emergencies only and drivers should not be forced to use these bays to manage their regulated fatigue requirements.

There needs to be improved signage at these sites advising drivers of their purpose. A media campaign providing information on using emergency stopping bays could benefit all drivers and reduce stopping incidences in these bays.

**Recommendation 9:** Improve signage at emergency stopping bays.

**(vi) The relevance, practicality and timeliness of existing heavy vehicle rest area strategies and programs given best practice fatigue management and regulatory requirements.**

The NSW Government has available to them tools to support strategic location of heavy vehicle rest areas. Recently, Transport for NSW engaged with industry including the LBRCA on how to improve the quantity and standard of heavy vehicle rest stops in NSW. The [Heavy Vehicle Rest Stop Stakeholder Engagement Report](#) was published in August 2023 and is relevant to this Inquiry.

**(vii) Identification of international best practice design guidelines and requirements for heavy vehicle rest areas and their suitability for New South Wales.**

In 2019, the National Transport Commission released the [National Guidelines for the Provision of Rest Area Facilities](#). Transport for NSW adopted these Guidelines as a basis for working towards enhancing the provision of rest area facilities for heavy vehicle drivers on key national freight routes in NSW. Other sources of guidelines and requirements for heavy vehicle rest areas are:

- Operational Instruction 20.3 Roadside Rest Areas on Rural Roads by the Department for Infrastructure and Transport for South Australia
- The Heavy Vehicle Rest Areas – Rural Freight Routes NSW by Transport for NSW
- The Economic Evaluation of Heavy Vehicle Rest Areas by the Australian Transport Research Forum.



**(viii) The maintenance of heavy vehicle rest areas and management of public use of heavy vehicle rest stop facilities.**

Increase monitoring and compliance of heavy vehicle rest areas and increase penalties for non-compliance by the public. Undertake a broad advertising campaign to educate the public on not using heavy vehicle rest areas. Rest areas should not be used to split up trailers whilst making deliveries or park long-term. There needs to be greater enforcement and penalties for using rest areas for trailer parking or for passenger or caravans using heavy vehicle rest areas.

Utilise existing restroom facilities (public restrooms that are locked after hours) to provide additional opportunities for heavy vehicle drivers to access driver facilities. For example, consider installing Avdata entry systems to existing public toilet blocks that enable entry for heavy vehicle drivers after hours. Maintenance of rest areas is a common problem and brings about tremendous stress for drivers having to use these unhygienic facilities. An Avdata access key would assist monitor access at these sites and maintain accountability of use.

There needs to be a greater focus on enforcement of parking restrictions in heavy vehicle rest areas. Illegal parking in these areas is more common at night, suggesting that focussed enforcement at these times needs to be increased. Options could include the installation of CCTV.

**The capability for new and emerging technologies to assist in reducing pressures for heavy vehicle drivers and effect driver practice and observance of regulatory obligations, such as through training, implementing safety measures and fatigue management.**

Transport for NSW already provides industry with an augmented digital rest area map showing all rest areas including private stopping opportunities. This could be enhanced to include additional information including number of parking bays.

In the future, this could be further enhanced to incorporate innovative technology (e.g., Parking availability technology). This could be incorporated into existing telematics systems and government mapping. As an example, the parking bays at Picton and other sites on the Hume Highway are almost always full. Signalling like they have in Victoria would be worth considering in NSW.

Many drivers know the roads they travel and having another set of maps to look to find rest areas is cumbersome. LBRCA recommends that NSW rest areas, inclusive of approved green light reflector sites, be overlaid onto all existing NSW and NHVR access maps.

Further, Electronic Messaging Service (EMS) signage on major highways educating the public on the use of heavy vehicle rest areas (including highlighting the penalties) could be utilised. This is particularly relevant during holiday periods.

Spatial access maps (turn by turn navigation), currently in development by the NHVR, could be used to assist drivers identify available heavy vehicle parking opportunities.

**Any other related matters.**

**(i) Without Trucks Australia Stops: the development of a viable, safe, sustainable and efficient road transport industry.**

LBRCA refers the Committee to the Senate Standing Committee on Regional and Rural Affairs report, [‘Without Trucks Australia Stops: the development of a viable, safe, sustainable and efficient road transport industry’](#) that provides an in-depth and relevant summary of the pressures faced by the heavy vehicle road transport industry.

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<sup>i</sup> [Austroads Guidelines for the Provision of Heavy Vehicle Rest Areas](#), 2019

<sup>ii</sup> Transport for NSW Heavy Vehicle Rest Area Stakeholder Engagement Report, August 2023, Page 11